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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

v.

Lavonte Sampson,

Defendant.

Case 2:21-cr-20732
Judge Drain
Filed: 12/7/2021
IND USA V SAMPSON

Violations:
18 U.S.C. § 1591(a)
18 U.S.C. § 2251(a)

INDICTMENT

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

At all times relevant to this Indictment, a girl, Minor Victim One (or MV-1), whose identity is known to the Grand Jury, was the victim of the crimes alleged herein. MV-1 was a resident of the State of Michigan, was 15 years old, and was born in 2005.

COUNT ONE

Sex Trafficking of Children – 18 U.S.C. § 1591(a)

From on or about November 24, 2020 through on or about November 30, 2020, in the Eastern District of Michigan, the defendant, LAVONTE SAMPSON, knowingly recruited, enticed, harbored, transported, provided, obtained and

maintained, in or affecting interstate or foreign commerce, Minor Victim One (MV-1), having had a reasonable opportunity to observe MV-1 and knowing or in reckless disregard of the fact that MV-1 had not attained the age of 18 years and that MV-1 would be caused to engage in a commercial sex act, all in violation of 18 U.S.C. § 1591(a).

COUNT TWO

Production of Child Pornography – 18 U.S.C. § 2251(a)

Between on or about November 24, 2020 and on or about November 30, 2020, in the Eastern District of Michigan, the defendant, LAVONTE SAMPSON, did knowingly employ, use, persuade, induce, entice, and coerce a minor (to wit: Minor Victim One) to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and the visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in or affecting interstate and foreign commerce, the visual depiction was transported and transmitted using any means or facility of interstate and foreign commerce, and the visual depiction was transported and transmitted in or affecting interstate and foreign commerce; all in violation of 18 U.S.C. § 2251(a).

FORFEITURE ALLEGATION

18 U.S.C. § 1594(d)(1) & (2), and 2253 – *Criminal forfeiture*

The allegations contained in Counts One and Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. §§ 1594 and 2253.

Pursuant to 18 U.S.C. § 1594, upon conviction of an offense in violation of 18 U.S.C. § 1591, the defendant, LAVONTE SAMPSON, shall forfeit to the United States of America (1) any property, real or personal, involved in, used, or intended to be used to commit or to facilitate the commission of the offenses, and any property traceable to such property; and (2) any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offenses, and any property traceable to such property.

Such property includes, but is not limited to, a money judgment equal to an amount as proved in this matter, representing the total value of property subject to forfeiture from the defendant for his violation of 18 U.S.C. § 1591, as alleged in Count One of this Indictment.

Upon conviction of an offense in violation of Title 18, United States Code, Sections 2251, the defendant, LAVONTE SAMPSON, shall, pursuant to 18 U.S.C. § 2253, forfeit to the United States the following:

- i. Any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction,

which was produced, transported, mailed, shipped, or received in violation of these subsections;

- ii. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- iii. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

The property to be forfeited includes, but is not limited to, entry of a forfeiture money judgment for the total amount of proceeds obtained, directly or indirectly, as a result of the offenses and for the total value of any property that was used to commit or to facilitate the commission of the offenses.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b) and 28 U.S.C. § 2461(c).

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

SAIMA S. MOHSIN
Acting United States Attorney

s/ Craig F. Winingar
CRAIG F. WININGER
Chief, Violent & Organized Crime Unit
Assistant United States Attorney

s/ Ranya Elzein
RANYA ELZEIN
Assistant United States Attorney

Dated: December 7, 2021

United States District Court Eastern District of Michigan	Criminal Case Cov
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete the signature line.

Companion Case Information	Companion Case Number:
This may be a companion case based on LCrR 57.10(b)(4) ¹ :	N/A
<input checked="" type="checkbox"/> No	AUSA's Initials: R.E.

Case Title: USA v. Lavonte Sampson

County where offense occurred: Wayne

Offense Type: Felony

Indictment – no prior Complaint

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

Reason:

Defendant Name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case

December 7, 2021

Date

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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.